

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: Target Corporation Customer Data  
Security Breach Litigation

MDL No. 14-2522 (PAM/JJK)

This Document Relates to:

All Consumer Cases

**DECLARATION OF CONSUMER PLAINTIFFS' LEAD COUNSEL  
VINCENT J. ESADES IN SUPPORT OF MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

I, Vincent J. Esades, declare:

1. I am an attorney licensed to practice before the courts of Minnesota and North Dakota. I am privileged to serve as the Court-appointed Lead Counsel on behalf of Plaintiffs in the Consumer Cases in this litigation. I am a partner in the firm Heins Mills & Olson, P.L.C. On behalf of Class Counsel in the Consumer Cases, I submit this Declaration in support of Consumer Plaintiffs' Motion for Final Approval of Class Action Settlement. I have knowledge of the facts presented in this Declaration based on my extensive involvement in prosecuting this litigation since its inception.

2. In my Declaration dated July 10, 2015 (ECF No. 483), I provided the Court with information concerning Class Counsel's reported lodestar and expenses reasonably incurred in the prosecution of this litigation through May 15, 2015.

3. Class Counsel has incurred and will continue to incur significant time and expenses in presenting the Settlement to this Court for final approval, defending it on any appeal and assisting Class Members. Since the filing of Consumer Plaintiffs' Motion for Payment of Service Awards to Class Representatives and for an Award of Attorneys' Fees and Reimbursement of Expenses and supporting papers (ECF Nos. 481-485) and through September 15, 2015, Class Counsel has already expended an additional \$89,556 in attorneys' fees for ongoing work including responding to Class Members' numerous inquiries, working with the Court-appointed notice expert, Kinsella Media, LLC, working with the Settlement Administrator, Rust Consulting, Inc., concerning the claims verification and sampling processes, and preparing preliminary and final approval motions and supporting papers.

4. In its Preliminary Approval Order the Court designated the Consumer Plaintiffs named in the Complaint and identified in Exhibit 8 of the Settlement Agreement as Settlement Class Representatives. Order 3, ECF No. 364. The Settlement Class Representatives are listed in revised Exhibit 8 to the Settlement Agreement, filed April 13, 2015 (ECF No. 373-1). The Court found that the Settlement Class Representatives are similarly situated to absent Class Members, are typical of the Class and will be adequate Settlement Class Representatives. Order 3.

5. Class Counsel has communicated with all of the 113 Settlement Class Representatives. Each of the Settlement Class Representatives has approved the Settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of October, 2015, in Minneapolis, Minnesota

s/ Vincent J. Esades  
Vincent J. Esades